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Attorneys for the Plaintiffs' Executive
Committee appointed by the Superior
Court of the State of California, in and for
the County of Alameda, in Case No.
RG16843631 and related cases.

THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

In re:

PACIFIC GAS AND ELECTRIC COMPANY,
Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case, No.
19-30088(DM)*

Case Nos. 19-30088 (DM)

Chapter 11

**JOINDER IN MOTION FOR RELIEF
FROM AUTOMATIC STAY IN
CONNECTION WITH THE GHOST
SHIP FIRE CLAIMS**

DATE: December 17, 2019
TIME: 10:00 a.m.
PLACE: Courtroom 17
450 Golden Gate Avenue,
16th Fl.
San Francisco, California

JUDGE: Hon. Dennis Montali

RELATED DOCKETS: 4875-4879

Plaintiffs in the Ghost Ship Fire Cases who are also Fire Victim Claimants, whose names
are set forth below (hereinafter collectively referred to as the "Ghost Ship Claimants"), by and
through their attorneys of record, do hereby respectfully submit the following Joinder in Motion

1 for Relief from Automatic Stay in Connection with the Ghost Ship Fire Claims (the “Joinder”).

2
3 **I.**
4 **INTRODUCTION**

5 On November 26, 2019, the Plaintiffs’ Executive Committee appointed by the Superior
6 Court of the State of California, County of Alameda, in Case No. RG16843631 and related cases
7 (the “Ghost Ship Executive Committee”) filed a Motion for Relief from the Automatic Stay to
8 Permit the Courts of the State of California to Conduct a Jury Trial and Related Pretrial and Post
9 Trial Matters in Connection with the Ghost Ship Fire Cases (the “Motion for Relief from the
10 Automatic Stay”) (Dkt. 4875).

11 The signatories below are the counsel for the various plaintiffs in the *In re Ghost Ship*
12 *Fire Litigation*, Case No. RG16843631 (And Related Cases).

13 **II.**
14 **JOINDER**

15 The Ghost Ship Claimants, named below, join as moving parties in the Motion for Relief
16 from the Automatic Stay:

- 17 1. David Gregory, individually, as Personal Representative of the Estate of
18 Michela Gregory, and as Successor in Interest of Michela Gregory; Kimberly
19 Gregory, individually and as Successor in Interest to Michela Gregory; and
20 Estate of Michela Gregory; and
21 2. Lesley Moran, as Guardian Ad Litem to A.G. and L.G., minors, Individually
22 and as Successors in Interest of Alex Ghassan; Lesley Moran as Personal
23 Representative of the Estate of Alex Ghassan; and the Estate of Alex Ghassan;
24 and
25 3. Janet Barmby, Individually, as Personal Representative of the Estate of
26 Jennifer Mendiola, and as Successor in Interest of Jennifer Mendiola; John
Barmby, Individually and as Successor in Interest of Jennifer Mendiola;
Jean-Thierry Mendiola, Individually and as Successor in Interest of Jennifer
Mendiola; and Estate of Jennifer Mendiola; and
4. Ivannia Chavarria, Individually, as Personal Representative of the Estate of
Brandon Wittenauer, and as Successor in Interest of Brandon Wittenauer; and
Estate of Brandon Wittenauer; and

- 1 5. Bruce Fritz, Individually, as Personal Representative of the Estate of Justin
2 Fritz (also known as Riley Fritz), and as Successor in Interest of Justin Fritz
3 (also known as Riley Fritz); Nancye Fritz, Individually and as Successor in
 Interest of Justin Fritz (also known as Riley Fritz); and Estate of Justin Fritz
 (also known as Riley Fritz); and
- 4 6. Natalie Jahanbani, Individually, as Personal Representative of the Estate of
5 Matthew Bohlka (also known as EM Bohlka), and as Successor in Interest of
6 Matthew Bohlka (also known as EM Bohlka); and Estate of Matthew Bohlka
 (also known as EM Bohlka); and
- 7 7. Mason Dixon, Successor in Interest to John Dixon, as heir to the Estate of
 William Dixon; and the Estate of William Dixon; and
- 8 8. Andrew Kershaw, Individually, as Personal Representative of the Estate of
9 Amanda Kershaw, and as Successor in Interest of Amanda Kershaw; Linda
10 Regan, Individually and as Successor in Interest of Amanda Kershaw; Paul
 Allen, Individually and as Successor in Interest of Amanda Kershaw; and
 Estate of Amanda Kershaw; and
- 11 9. Michael Madden, Individually, as Personal Representative of the Estate of
12 Griffin Madden, and as Successor in Interest of Griffin Madden; Catherine
13 Madden, Individually and as Successor in Interest of Griffin Madden; and
 Estate of Griffin Madden; and
- 14 10. Michael Morris, Individually, as Personal Representative of the Estate of
15 Jennifer Morris, and as Successor in Interest of Jennifer Morris; Toshiko
 Morris, Individually and as Successor in Interest of Jennifer Morris; and Estate
 of Jennifer Morris; and
- 16 11. Gretchen Porter, Individually, as Personal Representative of the Estate of
17 William Dixon, and as Successor in Interest of William Dixon; and Estate of
 William Dixon; and
- 18 12. Susan Slocum¹, Individually, as Personal Representative of the Estate of
19 Donna Kellogg, and as Successor in Interest of Donna Kellogg; and Estate of
 Donna Kellogg; and
- 20 13. Court Tanouye, Individually, as Personal Representative of the Estate of
21 Jennifer Tanouye, and as Successor in Interest of Jennifer Tanouye; Tomoko
22 Tanouye, Individually and as Successor in Interest of Jennifer Tanouye; and
 Estate of Jennifer Tanouye; and
- 23 14. Edward Wadsworth, Individually, as Personal Representative of the Estate of
24 Peter Wadsworth, and as Successor in Interest of Peter Wadsworth; Suzanne
 Wadsworth, Individually and as Successor in Interest of Peter Wadsworth; and
 Estate of Peter Wadsworth; and
- 25 15. Brian Hough, an individual, and as successor-in-interest to Travis Hough; Judy
26 Hough, an individual, and as successor-in-interest to Travis Hough ; and

¹ Ms. Slocum is a member of the Official Committee of Tort Claimants in the above captioned jointly administered cases.

16. Carol Cidlik, an individual, and as successor-in-interest to Nicole Siegrist; and
17. John Georges Igaz, an individual, and as successor-in-interest to John Nicholas Igaz; and
18. Richard Runnels, an individual, and as successor-in-interest to Benjamin Runnels; Lorraine Runnels, an individual, and as successor-in-interest to Benjamin Runnels; and
19. Colleen Dolan, Individually and as Personal Representative of the Estate of Chelsea Dolan; and
20. Rodney Clark, Individually and as Personal Representative of the Estate of Barrett Clark; and
21. Tamra McGill, Individually, as a Personal Representative of the Estate of Draven McGill, and as Successor in Interest of Draven McGill; and Phillip McGill, Individually; and
22. Maria Vega, individually and as heir to Alex Vega, deceased; Manuel Vega, individually and as heir to Alex Vega, deceased; and Maria Vega and Manuel Vega as co-representatives of the Estate of Alex Vega; and
23. James and Deborah Walrath, individually and as heir to Nicholas Walrath, deceased; and James and Deborah Walrath as co-representatives of the Estate of Nicholas Walrath; and
24. Dennis Cline, individually and as heir to David Riley Cline, deceased; Kerry Cline, individually and as heir to David Riley Cline, deceased; and Dennis Cline and Kerry Cline as co-representatives of the Estate of David Riley Cline; and
25. Christopher Askew, Individually and as Successor in Interest of Cash Askew; and
26. Jack Bohlka, Individually and as Personal Representative of the Estate of Matthew Bohlka (also known as Em Bohlka) and as Successor in Interest of Matthew Bohlka (also known as Em Bohlka); and
27. Margaret Bohlka, individually and as heir to Matthew Andrew Bohlka aka Em Bohlka, deceased; and
28. Gene McCarty and Colleen McCarty, Individually and as Personal Representatives of the Estate of Jason McCarty; and
29. Yrjo Timonen and Kirsi Piha-Timonen, Individually and as Successors in Interest to Hanna Ruax; and
30. Gary Plotkin and Valerie Plotkin, Individually and as Successors in Interest to Vanessa Plotkin; and

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31. Robert E. Lapine, Individually, and as Successor-in-Interest to Edmond W. Lapine, II, Deceased; and
32. John Matlock, individually, and as successor-in-interest to Joseph Hudson Matlock, Deceased; and
33. Kathe Matlock, individually, and as successor-in-interest to Joseph Hudson Matlock, Deceased; and
34. Randall Wittenauer, individually, and as successor-in-interest to Brandon Chase Wittenauer, Deceased; and
35. Yraina L. Kopelman, individually, and as successor-in-interest to Edmond William Lapine, II, Deceased; and
36. George D. Kellogg, individually And on behalf of Donna Kellogg, Deceased; and
37. Christopher Danemayer, Individually and as Successor in Interest of Micah Krueger Danemayer; and Pamela Krueger, Individually and as Successor in Interest of Micah Krueger Danemayer; and
38. Yoo Sook Jo, Individually and as Successor in Interest of Ara Christina Jo; and Caleb Seong Jo, Individually and as Successor in Interest of Ara Christina Jo; and
39. Farzaneh Farsoudi-Hoda, individually and as heir to Sara Hoda, deceased; and
40. Leisa Askew, individually and as heir of Cash Askew, deceased; and
41. Jeffrey Sylvan and Ursula Sylvan, Individually and as Successors in Interest of Michele Marie Sylvan; and
42. Samuel Maxwell²; and
43. Anthony Perrault; and
44. Aaron Marin; and
45. Benjamin Langfur; and
46. Emilie Grandchamps; and
47. Robert Jacobitz; and
48. Jose Avalos; and
49. Carmen Brito; and

² Mr. Maxwell is a member of the Official Committee of Tort Claimants in the above captioned jointly administered cases.

50. David Calvera; and
51. Adam Kennon; and
52. Hunter Morton; and
53. Andrew Ruiz; and
54. Michael Russell; and
55. Leah Vega; and
56. Nicole Kelber.

The Motion for Relief from the Automatic Stay sets forth the reasons why this Court should grant relief from automatic stay. The Ghost Ship Claimants hereby fully incorporate, by reference, the arguments set forth in the Motion for Relief from the Automatic Stay, as if fully set forth herein.

The Ghost Ship Claimants have been waiting three years for justice. Many lost their children, who were struck down in the prime of their lives. Some of the claimants lost their homes. Two little girls, who were only 4 years old at that time, lost their father. One was horribly injured and will require 24 hour attendant care for the rest of his life. Justice delayed is justice denied and the Ghost Ship Claimants will receive no justice and no resolution, in this Court. These victims deserve closure.

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1 **III.**
2 **CONCLUSION**

3 For all the foregoing reasons, the Ghost Ship Claimants respectfully request that this
4 Court grant the Motion for Relief from the Automatic Stay.

5 Date: December 7, 2019

Respectfully Submitted,

6 **MARY ALEXANDER & ASSOCIATES, P.C.**

7
8 By: /s/Mary E. Alexander

9 Mary E. Alexander,
10 Plaintiffs Liaison Counsel and Attorneys for
11 David gregory, Kimberly Gregory, Jose
12 Avalos, Janet Barmby, John Barmby,
13 Jean-Thierry Mendiola, Carmen Brito, David
14 Calvera, Ivannia Chavarria, Bruce Fritz,
15 Nancye Fritz, Alexandria Ghassan and
16 Lucienne Ghassan, by and through their
17 Guardian ad Litem, Lesley Moran, Natalie
18 Jahanbani, Adam Kennon, Andrew Kershaw,
19 Linda Regan, Paul Allen, Michael
20 Madden, Catherine Madden, Michael Morris,
21 Toshiko Morris, Hunter Morton, Gretchen
22 Porter, Andrew Ruiz, Michael Russell, Susan
23 Slocum Court Tanouye, Tomoko Tanouye, Leah
24 Vega, Edward Wadsworth and Suzanne
25 Wadsworth.

26 Date: December 9, 2019

Respectfully Submitted,

DOLAN LAW FIRM PC

By: /s/Arsen Sarapinian

Arsen Sarapinian, Esq.,
Attorneys for Plaintiffs Carol Cidlik, Brian
Hough, Judy Hough, John Georges Igaz,
Richard Runnels, and Lorraine Runnels.

SIGNATURES CONTINUE ON THE NEXT PAGE

1 Date: December 7, 2019

Respectfully Submitted,

2 **THE BRANDI LAW FIRM**

3
4 By: /s/Thomas Brandi
5 Thomas Brandi, Esq.,
6 Attorneys for Plaintiffs Rodney Clark and
Colleen Dolan.

7 Date: December 7, 2019

Respectfully Submitted,

8 **DREYER BABICH BUCCOLA WOOD**
9 **CAMPORA, LLP**

10 By: /s/Robert B. Bale
11 Robert B. Bale, Esq.,
12 Attorneys for Plaintiffs Dennis Cline, Kerry
13 Cline, Tamra McGill, Phillip McGill, Maria
Vega, Manuel Vega, James Walrath, and
Deborah Walrath.

14 Date: December 7, 2019

Respectfully Submitted,

15 **KAUPP & FEINBERG**

16
17 By: /s/W. Gordon Kaupp
18 W. Gordon Kaupp, Esq.
Attorneys for Plaintiff Samuel Maxwell

19 Date: December 9, 2019

Respectfully Submitted,

20 **RIBERA LAW FIRM**

21
22 By: /s/Sandra Ribera Speed
23 Sandra Ribera Speed, Esq.
24 Attorneys for Plaintiff Christopher Askew

25 *SIGNATURES CONTINUE ON THE NEXT PAGE*

1 Date: December 7, 2019

Respectfully Submitted,

2 **LAW OFFICE OF JOSHUA COHEN**
3 **SLATKIN**

4 By: /s/Joshua Cohen Slatkin

5 Joshua Cohen Slatkin, Esq.

6 Attorneys for Plaintiff Jack Bohlka

7 Date: December 7, 2019

Respectfully Submitted,

8 **THON BECK VANNI CALLAHAN &**
9 **POWELL**

10 By: /s/Raffi H. Ohanian

11 Raffi H. Ohanian, Esq.

Attorneys for Plaintiff Margaret Bohlka

12 Date: December 7, 2019

Respectfully Submitted,

13 **GIRARDI KEESE**

14
15 By: /s/Arin Scapa

16 Arin Scapa, Esq.

17 Attorneys for Plaintiffs Emilie

Grandchamps, individually and as successor in
interest of Alex Ghassan, Robert Jacobitz,

18 Benjamin Langfur, Aaron Marin, Gene

McCarty, Colleen McCarty, Yrjo Timonen,

19 Kirsi Piha-Timonen

20 Date: December 8, 2019

Respectfully Submitted,

21 **THE ARNS LAW FIRM**

22
23 By: /s/Robert C. Foss

24 Robert C. Foss, Esq.

25 Attorneys for Plaintiffs Gary Plotkin and
26 Valerie Plotkin

SIGNATURES CONTINUE ON THE NEXT PAGE

1 Date: December 7, 2019

Respectfully Submitted,

2 **BAUM HEDLUND ARISTEI GOLDMAN, PC**

3
4
5 By: /s/Clay Robbins, III

Clay Robbins, III, Esq.

6 Attorneys for Plaintiff Robert Lapine

7 Date: December 7, 2019

Respectfully Submitted,

8 **LAW OFFICE OF JOHN R. BROWNE, III**

9
10
11 By: /s/John R. Browne, III

John R. Browne, III, Esq.

12 Attorneys for Plaintiff George Kellogg

13
14 Date: December 7, 2019

Respectfully Submitted,

15 **ROUDA FEDER TIETJEN MCGUINN**

16
17 By: /s/John M. Feeder

John M. Feder, Esq.

18 Attorneys for Plaintiffs Christopher
19 Danemeyer and Pamela Krueger

20
21
22
23 *SIGNATURES CONTINUE ON THE NEXT PAGE*

1 Date: December 8, 2019

Respectfully Submitted,

2 **LAW OFFICES OF DO KIM APLC**

3
4
5 By: /s/Do Kim
6 Do Kim, Esq.
7 Attorneys for Plaintiffs Yoo Sook Jo and
8 Caleb Seong Jo

9 Date: December 7, 2019

Respectfully Submitted,

10 **SIEGEL & YEE**

11 By: /s/Dan Siegel
12 Dan Siegel, Esq.
13 Attorneys for Plaintiff Farzaneh Farsoudi-
14 Hoda

15 Date: December 7, 2019

Respectfully Submitted,

16 **LIUZZI MURPHY SOLOMON CHURTON &
17 HALE, LLP**

18 By: /s/David L. Winnett
19 David L. Winnett, Esq.
20 Attorneys for Plaintiff Leisa Askew
21
22

23 *SIGNATURES CONTINUE ON THE NEXT PAGE*
24
25
26

1 Date: December 7, 2019

Respectfully Submitted,

2 **LAW OFFICE OF PAUL L. ALAGA**

3
4
5 By: /s/Paul L. Alaga
6 Paul L. Alaga, Esq.
7 Attorneys for Plaintiff Anthony Perrault

8 Date: December 7, 2019

Respectfully Submitted,

9 **LAW OFFICE OF RANDAL BLAIR**

10
11 By: /s/Randal F. Blair
12 Randal F. Blair, Esq.
13 Attorneys for Plaintiffs Jeffrey Sylvan and
14 Ursula Sylvan

15 Date: December 7, 2019

Respectfully Submitted,

16 **FIORE ACHERMANN**

17
18 By: /s/Sophia M. Achermann
19 Sophia M. Achermann, Esq.
20 Attorneys for Plaintiff Nicole Kelber

21 Date: December 7, 2019

Respectfully Submitted,

22 **THE MATIASIC FIRM, P.C.**

23
24 By: /s/Paul A. Matiasic
25 Paul A. Matiasic, Esq.
26 Attorneys for Plaintiffs Yraina
Kopelman. Kathe Matlock, John Matlock and
Randall Wittenauer.

1
2 The Ghost Ship Executive Committee supports this joinder to its Motion.
3

4
5 Date: December 9, 2019

Respectfully submitted,

6 **PINO & ASSOCIATES**

7
8 By: /s/Estela O. Pino

9 Estela O. Pino, Attorneys for Plaintiffs'
10 Executive Committee appointed by the Superior
11 Court of the State of California, in and for the
12 County of Alameda, in Case No. RG16843631
13 and related cases.
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CERTIFICATION

In compliance with Civil Local Rule 5-1(i)(3), I attest under penalty of perjury that each signatory has concurred in the filing of this document.

Executed on December 9, 2019, at Roseville, Placer County, California.

/s/Estela O. Pino
Estela O. Pino